

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE

FILED  
2023 MAR 24 PM 4:49

In re:

Case No. 21-11269-JKS

NLG, LLC,  
a Delaware LLC  
Debtor

Chapter 7

CHRIS KOSACHUK  
Plaintiff

v.

Adversary Case No. 22-ap-50421-JKS

9197-5904 QUEBEC, INC. &  
SELECTIVE ADVISORS GROUP, LLC

**REPLY TO RESPONSE [D.I. 27] TO MOTION FOR REHEARING,  
RECONSIDERATION AND RELIEF FROM OPINION AND ORDER DISMISSING  
ADVERSARY PROCEEDING [D.I. 23 & 24] AND REQUEST FOR ORAL ARGUMENT  
AND EVIDENTIARY HEARING**

Plaintiff Chris Kosachuk (“Kosachuk” or “Movant”), *pro se*, files this Reply to the Response [D.I. 27] to Motion for Rehearing, Reconsideration and Relief From Opinion [D.I. 23] and Order Dismissing Adversary Proceeding [D.I. 24] (the “Dismissal Order”) pursuant to Rules 9023 and 9024 of the Federal Rules of Bankruptcy Procedure (“FRBP”) and Rules 59 and 60 of the Federal Rules of Civil Procedure (“FRCP”). Movant respectfully states:


Movant requests oral argument and an evidentiary hearing because the Respondent/Defendants, Selective Advisors Group, LLC and 9197-5904 Quebec, Inc. continue to mislead this Court.

**WHEREFORE**, for the reasons set forth above, Movant respectfully requests that the Court grant the Motion for Relief Opinion and Order Dismissing Adversary, adjudicate the Motion

Reply to Response to Motion for Relief from Opinion & Order Dismissing Adversary Proceeding  
Case No. 22-ap-50421-JKS  
Page 2 of 3


for Summary Judgment, cancel the sham Judgment by Confession indebtedness *nunc pro tunc* to date of entry of February 22, 2012 and grant such other and further relief as is equitable and just.

Respectfully submitted,

	 Chris Kosachuk <i>Pro Se Movant/Creditor</i> 854 Pheasant Run Rd. West Chester, PA 19382-8144 (305) 490-5700 chriskosachuk@gmail.com
--	---

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 24th day of March 2023, a true and correct copy of the foregoing was hand delivered to the Court, which record on the docket and will electronically serve a copy of the foregoing document on all parties of record.

 Chris Kosachuk <i>Pro Se Movant/Creditor</i> 854 Pheasant Run Rd. West Chester, PA 19382-8144 (305) 490-5700 chriskosachuk@gmail.com
---

Reply to Response to Motion for Relief from Opinion & Order Dismissing Adversary Proceeding  
Case No. 22-ap-50421-JKS  
Page 3 of 3

**SERVICE LIST**

**Served via CM/ECF**

All parties of record